

# **EXHIBIT 168**

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK**

STATES OF NEW YORK,  
MASSACHUSETTS,  
WASHINGTON, COLORADO,  
CONNECTICUT, DELAWARE,  
DISTRICT OF COLUMBIA,  
HAWAII, ILLINOIS, IOWA, NEW  
MEXICO, NORTH CAROLINA,  
OREGON, PENNSYLVANIA,  
RHODE ISLAND, VERMONT, and  
VIRGINIA,

Plaintiffs,

v.

DONALD TRUMP, in his official capacity as President of the United States; U.S. DEPARTMENT OF HOMELAND SECURITY; ELAINE C. DUKE, in her official capacity; U.S. CITIZENSHIP AND IMMIGRATION SERVICES; U.S. IMMIGRATION AND CUSTOMS ENFORCEMENT; and the UNITED STATES OF AMERICA,

CIVIL ACTION NO. 1:17-cv-05228  
(NGG) (JO)

Defendants.

## **DECLARATION OF ÁNGEL CABRERA**

Pursuant to 28 U.S.C. § 1746 (2), I, Ángel Cabrera, hereby declare as follows:

1. I am the President of George Mason University (“GMU” or “University”), a position I have held since 2012. As President, I serve as the chief executive, educational and administrative officer of GMU. I have personal knowledge of the matters set forth below or have knowledge of those matters based on my review of information and records gathered by members of my staff.
  
2. GMU is the largest public research university in Virginia and ranked the most diverse university in Virginia by U.S. News and World Report.<sup>1</sup> With its home in Virginia’s most diverse region, GMU recruits and attracts a student body that is extraordinarily diverse by any measure, including in country of origin, language, culture, race, ethnicity, religion, geography, family income, age, and educational background. GMU serves students of all ages, nationalities, and backgrounds enrolling nearly 36,000 students from 130 countries and all 50 states. GMU is situated in a region with the largest immigrant populations in the state, and has a historic tradition of educating immigrants. GMU is committed to admitting, enrolling, and teaching students regardless of their national origin or immigration or citizenship status. GMU’s core mission is to be an innovative and inclusive academic community committed to creating a more just, free, and prosperous world.

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<sup>1</sup> Cristodero, D. (2017, January 12). Mason Named Most Diverse University in Virginia. Retrieved from <https://www2.gmu.edu/news/452276>.

3. GMU has approximately 245 students presently enrolled across the University who are participants in Citizenship and Immigration Services' Deferred Action for Childhood Arrivals ("DACA").<sup>2</sup> Of these students, 223 are registered for Fall 2017 classes, and 18 are wage employees.
4. GMU's DACA-enrolled students make real, valuable, and lasting contributions to the University, through their classroom participation, their extra-curricular engagements, and their commitment to independent study and research.
5. The DACA program provides real, meaningful benefits to GMU, its DACA student population, and the rest of the University community. The DACA program has provided an important cohort of GMU students with legal protections and financial opportunities that have enhanced their ability to take full advantage of education programs at GMU.<sup>3</sup> DACA students with work permits employed at GMU, support and learn from GMU faculty and scholars as part of their paid work. DACA work permits further enable these students to work and earn money during and between terms, to put toward their tuition and living expenses at GMU, and the DACA allowance gives these students an assurance that they may put their talents and learning to use in the United States job market after graduation. The DACA program has benefitted Virginia residents with employment opportunities at GMU. The DACA program has also benefitted GMU, as DACA students

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<sup>2</sup> This calculation reflects students who opted to self-identify. GMU estimates that actual numbers are higher.

<sup>3</sup> DACA students domiciled in Virginia are eligible to apply for in-state tuition. See <http://www.schev.edu/docs/default-source/tuition-aid-section/financial-aid/dacafaqs.pdf>.

and employees contribute their unique perspectives inside and outside the classroom, thereby supporting GMU's core institutional characteristics of diversity and accessibility: an open and welcoming community bringing together a multitude of people and ideas, and fostering a culture of inclusion that makes the University community more effective educators and scholars.<sup>4</sup>

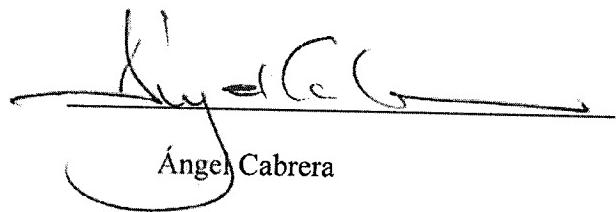
6. For as long as they have active DACA protection, DACA participating students enrolled in GMU can pursue their courses of study and fully invest themselves in their educational endeavors, without fear of sudden detention or removal. Discontinuance of DACA will withdraw these educational opportunities, and reintroduce fear and uncertainty into their lives. DACA-enrolled students would be subject to deportation and likely lose their sense of educational purpose which would impact their retention and academic success. The employment status of DACA-enrolled students at GMU would also be jeopardized.
7. The elimination of the DACA program would negatively affect GMU's investment of significant financial and human resources in teaching all of its students and preparing a well-trained workforce. Most significantly, the elimination of the DACA program will undermine GMU's unwavering commitment to diversity and inclusion.

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<sup>4</sup> The Mason Idea – Our Core Institutional Characteristics. Retrieved from <https://vision.gmu.edu/the-mason-vision/our-goal/>.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge.

Executed on: September 27, 2017



A handwritten signature in black ink, appearing to read "Angel Cabrera". Below the signature, the name "Ángel Cabrera" is printed in a smaller, standard font.